

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

SECURITIES AND EXCHANGE	)	
COMMISSION,	)	
	)	
Plaintiff,	)	JUDGE JAMES GWIN
v.	)	
	)	
MATTHEW M. MOTIL,	)	
NORTH SHORE EQUITY SALES, LLC, d/b/a	)	CASE NO. 1:23-CV-1853
THE MARIE PAUL COMPANY,	)	
NORTH SHORE EQUITY MANAGEMENT,	)	
LLC,	)	
	)	<b><u>STATUS REPORT</u></b>
Defendants,	)	
	)	
AMY DOUBRAVA MOTIL,	)	
	)	
Relief Defendant.	)	

Now come Defendants Matthew M. Motil (“Mr. Motil”), North Shore Equity Sales, LLC, d/b/a The Marie Paul Company, and North Shore Equity Management, LLC (collectively, the “Motil Defendants”), and Relief Defendant Amy Doubrava Motil (“Mrs. Motil” and together with the Motil Defendants, the “Defendants”) by and through their counsel, and hereby respectfully provide the Court this status report in anticipation of the status conference scheduled for **Wednesday, August 14, 2024 at 10:00 a.m.**

Since the last status conference, Mr. Motil has executed a plea agreement with the Government, and a criminal information has been filed in Case 1:24-cr-00289-DCN (the “criminal case”). The Government has also indicated it anticipates filing a notice of related case regarding this matter and the criminal case.

Now that a final plea agreement has been reached in the criminal case, it is Mr. Motil’s intent to work towards a stipulated judgment as to liability in this case, subject to credit for any restitution paid in the related criminal case and/or settlement payments made in a certain bankruptcy matter involving the Motil Defendants, provided a reasonable resolution can be

reached between the SEC and Mrs. Motil. The Government has confirmed with Mrs. Motil's counsel that it will not charge Mrs. Motil with any crimes, nor will it file any forfeiture or civil claims against her.

Mr. Flannery also requests that he be permitted to participate in tomorrow's status conference via phone only because of out-of-state travel constraints that make video conferencing difficult.

Respectfully submitted,

/s/ Paul M. Flannery

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*Attorneys for Motil Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2024, a copy of the foregoing was filed electronically.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Paul M. Flannery

Paul M. Flannery